



**MCI Telecommunications  
Corporation**

1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

ORIGINAL

November 20, 1995

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

RECEIVED  
NOV 20 '95  
FEDERAL COMMUNICATIONS  
COMMISSION  
OFFICE OF THE  
SECRETARY

**Re: Amendment of the Commission's Rules and Policies to  
Increase Subscribership and Usage of the Public Switched  
Network, CC Docket No. 95-115; Notice of Proposed  
Rulemaking**

Dear Mr. Caton:

Enclosed herewith for filing are the original and nine (9) copies of MCI Telecommunications Corporation's Reply Comments regarding the above-captioned matter. These Reply Comments were scheduled to be filed November 14, 1995. However, due to the government shutdown, and pursuant to the Public Notice released November 13, 1995, these Reply Comments are being filed on November 20, 1995, the date the government reopened.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI Reply Comments furnished for such purpose and remit same to the bearer.

Sincerely yours,

Don Sussman  
Regulatory Analyst

Enclosure  
DHS

No. of Copies rec'd  
List ABCDE

OTF



ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of:

Amendment of the Commission's  
Rules and Policies to Increase  
Subscribership and Usage of the  
Public Switched Network

Notice of Proposed Rulemaking

CC Docket No. 95-115

DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS  
COMMISSION  
OFFICE OF THE  
SECRETARY

NOV 20 '95

RECEIVED

MCI REPLY COMMENTS

Don Sussman  
Regulatory Analyst  
1801 Pennsylvania Ave., NW  
Washington, DC 20006

November 20, 1995

## **Table of Contents**

Summary .....	<b><u>i</u></b>
I. Introduction .....	<b><u>1</u></b>
II. Background .....	<b><u>2</u></b>
III. The Commission Does Not Have Authority to Prohibit LECs from Disconnecting Local Service to Customers Who Fail to Pay Long Distance Charges .....	<b><u>3</u></b>
IV. Prohibiting Local Disconnection of Telephone Service for Failure to Pay Long Distance Charges Is Not in the Public Interest .....	<b><u>7</u></b>
V. Southwestern Bell Telephone Company's Request for Additional Pricing Flexibility is Misplaced .....	<b><u>10</u></b>
VI. NYNEX's Proposed Fund Should Not Be Financed Primarily By Interexchange Carriers .....	<b><u>12</u></b>
VII. Conclusion .....	<b><u>14</u></b>

## Summary

MCI Telecommunications Corporation ("MCI") respectfully submits its Reply to comments filed on September 27, 1995, regarding the Notice of Proposed Rulemaking, released July 20, 1995. In the Notice, the Commission requested comment on various proposals to increase subscribership, alternative techniques for measuring subscribership, methods for increasing consumer awareness of programs which help reduce telephone rates (e.g., Lifeline and Link-Up), and whether the Commission has legal authority to implement the particular proposals contained within the Notice.

In its Reply, MCI reiterates its position that before the Commission takes steps that would interfere in the marketplace (i.e., prohibiting local exchange carriers from disconnecting local services to customers who fail to pay long distance charges), the Commission must have evidence that clearly demonstrates why people select not to subscribe to telephone service. Presently, only speculations have been made. In the meantime, the Commission should take action to ensure that existing federal policies (e.g. Lifeline and Link-Up) are reaching the targeted population, utilize its forum as a "bully-pulpit" to make sure that all people fully understand the benefits and utility of existing telecommunications services, and promote policies that lead to the emergence of effective competition in all telecommunications markets.

MCI also responds to the few parties that support the Commission's proposal to prohibit LECs from disconnecting local service for failure to pay long-distance charges, NYNEX's proposal to establish yet another fund which would be financed primarily by long distance carriers, and SWBT's request for additional pricing flexibility.

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of:</b>	)	
	)	
<b>Amendment of the Commission's</b>	)	
<b>Rules and Policies to Increase</b>	)	<b>CC Docket No. 95-115</b>
<b>Subscribership and Usage of the</b>	)	
<b>Public Switched Network</b>	)	
	)	
<b>Notice of Proposed Rulemaking</b>	)	

**MCI REPLY COMMENTS**

**I. Introduction**

MCI Telecommunications Corporation ("MCI") respectfully submits its Reply to comments filed on September 27, 1995, regarding the above-mentioned Notice of Proposed Rulemaking.<sup>1</sup> In the Notice, the Commission requested comment on various proposals to increase subscribership, alternative techniques for measuring subscribership, methods for increasing consumer awareness of programs which help reduce telephone rates (e.g., Lifeline and Link-Up), and whether the Commission has legal authority to implement the particular proposals contained within the Notice.

---

<sup>1</sup> Amendment of the Commission's Rules and Policies to Increase Subscribership and Usage of the Public Switched Network, CC Docket No. 95-115 (FCC No. 95-281) Notice of Proposed Rulemaking ("Notice"), (released July 20, 1995).

While MCI, and the vast majority of those submitting comments, supported the Commission's initiative, only a handful of parties supported the Commission's proposal to prohibit local exchange carriers ("LECs") from disconnecting their customers for failure to pay long-distance charges. Most who commented on this issue argued that the Commission does not have the legal authority to mandate such a policy. MCI responds to the few parties that support the Commission's proposal to prohibit LECs from disconnecting local service for failure to pay long-distance charges. MCI also responds to NYNEX's proposal to establish yet another fund which would be financed primarily by long distance carriers, and SWBT's request for additional pricing flexibility.

## **II. Background**

In an attempt to increase subscribership from today's level of 93.9 percent, the Commission issued a Notice of Proposed Rulemaking aimed at developing "narrowly targeted," "cost-effective" solutions which can work to reduce obstacles that prevent those who want telephone service from being able to afford it. In the Notice, the Commission suggests that subscribership levels would increase among populations with low income levels if local exchange carriers were prohibited from disconnecting local service to customers who failed to pay long distance charges.

MCI commended the Commission for initiating the instant proceeding and for its concern that society not develop into one of information "haves" and "have

notes.” However, MCI advocated that public policies designed to increase subscribership should focus on how to create conditions that produce a wide variety of products and services that today’s nonsubscribers will find useful. Rather than establishing new funds or federally mandated policies that have proven to increase the cost of providing telecommunications services, the Commission should focus on universal service reform and promoting competition in local telecommunications access markets.

In its comments, MCI urged the Commission to take action to ensure that existing federal policies (e.g. Lifeline and Link-Up) are reaching the targeted population, and to utilize its forum as a “bully-pulpit” to make sure that all people fully understand the benefits and utility of existing telecommunications services. By so doing, the Commission could increase subscribership to targeted audiences, without increasing the cost of providing telecommunications services.

### **III. The Commission Does Not Have Authority to Prohibit LECs from Disconnecting Local Service to Customers Who Fail to Pay Long Distance Charges**

A majority of the parties commenting on the issue of preemption support MCI’s position that the Commission does not have jurisdiction to prohibit the disconnection of local service for nonpayment of interstate charges.<sup>2</sup> Several

---

<sup>2</sup> See Comments of Telephone Electronics Corporation at 6-10; Initial Comments of the Public Utilities Commission of Ohio at 3-7; Ameritech’s Comments



parties point out that technological developments in the last few years have made it possible to disconnect interstate service without disconnecting local service. That possibility, in turn, undermines the rationale previously asserted by this Commission in the Maryland PSC Order<sup>3</sup> for asserting jurisdiction over the disconnection of local service, namely, the impossibility of regulating the disconnection of interstate service separately from the disconnection of local service.

The D.C. Circuit, in upholding the Maryland PSC Order in the Maryland PSC decision, also made it clear that this Commission's assertion of authority over the disconnection of local service was entirely dependent on the technological limitations revealed in the record before it.<sup>4</sup> In fact, as Telephone Electronics Corporation (TEC) points out, not only is it possible now to disconnect interstate service without disconnecting local service, but it is also even possible to block local service independently of long distance service, removing any conceivable excuse for an assertion of jurisdiction by this Commission over disconnection of local service.<sup>5</sup> As the Ohio PUC concludes,

---

at 6-7; Comments of Bell Atlantic at 9-11; BellSouth Comments at 5-6; NYNEX Comments at 5-6; Comments of Pacific Bell and Nevada Bell at 20-22.

<sup>3</sup> Public Service Commission of Maryland, 4 FCC Rcd. 4000, 4006 (1989), pet. for review denied, Public Service Comm'n of Maryland v. FCC, 909 F.2d 1510 (D.C. Cir. 1990).

<sup>4</sup> Public Service Commission of Maryland v. FCC, 909 F.2d 1510, 1515-17 (D.C. Cir. 1990). See Comments of Bell Atlantic at 11.

<sup>5</sup> TEC Comments at 8-9.

“the FCC’s arguments in support of its preemptive authority over the states based on technological limitations are no longer sound.”<sup>6</sup>

A few parties assert that the Commission does have authority to prohibit the disconnection of local service for nonpayment of interstate charges, but none of those parties addresses the impact of recent technological developments on the jurisdictional issue.<sup>7</sup> Missouri PSC Commissioner Crumpton, Time Warner Communications Holdings, Inc. (Time Warner) and the American Association of Retired Persons (AARP) at least cite the Maryland PSC Order, but even they do not deal with the implications of that order, or of the D.C. Circuit decision upholding that order, for the very different state of technology that exists today.

Indeed, AARP seems totally oblivious to the rationale of those decisions, since it inadvertently undermines its position on jurisdiction by pointing out that “[t]he technological objection that local and interstate service are inextricable is out-of-date. Equipment now almost universally installed around the nation allows complete unbundling of local and interstate services.”<sup>8</sup> That is exactly why this

---

<sup>6</sup> Ohio PUC Comments at 5. See also, NYNEX Comments at 6.

<sup>7</sup> See Comments of the American Association of Retired Persons at 8-10; Comments of Teleport Communications Group Inc. at 9-10; Comments of the Public Utility Law Project of New York, Inc. at 8-10; Comments of Time Warner Communications Holdings, Inc. at 7-8; Comments of Commissioner Harold Crumpton, Missouri Public Service Commission.

<sup>8</sup> AARP Comments at 8. Time Warner also fails to recognize the significance of the Commission’s reliance in the Maryland PSC Order “on the fact that it is not possible to separate the interstate and intrastate components of the billing and collection process performed by LECs for interstate carriers,” id. at 8, or even that this “fact” is no longer true.

Commission may not exercise any authority over the disconnection of local service, under the rationale of the Maryland PSC decisions.<sup>9</sup> As the Court stated:

The Maryland PSC suggests that it may be possible technologically to cut off interstate access independent of local service.... At the time it issued the Detariffing Order, the FCC believed that such a separation was not practical... And where the state has not suggested a means to unbundle the interstate and intrastate components of a matter, "we have no basis to quarrel with the FCC's contention that no order could have accommodated both the local and federal regulatory interests." If the Maryland PSC should produce such evidence, that would present a different case.<sup>10</sup>

The current technology now "present[s] a different case," depriving the Commission of jurisdiction over local service disconnection.

The Public Utility Law Project echoes the Commission's concern that the complete disconnection of local service would prevent a subscriber from receiving interstate calls or making "800" interstate calls.<sup>11</sup> As TEC points out, however, even that is no longer necessarily true, since local service could be blocked while allowing outgoing and incoming interstate service.<sup>12</sup> Based on the initial comments, it is therefore clear that this Commission no longer has

---

<sup>9</sup> See Maryland PSC Order, 4 FCC Rcd. at 4006; Maryland PSC, 909 F.2d at 1516-17. See MCI Comments at 9-10.

<sup>10</sup> Maryland PSC, 909 F.2d at 1516-17 (quoting Public Utility Commission of Texas v. FCC, 886 F.2d 1325, 1334 (D.C. Cir. 1989)).

<sup>11</sup> Public Utility Law Project at 8-9 & n.16.

<sup>12</sup> TEC Comments at 8-9.

jurisdiction to prohibit the disconnection of local service, whether for nonpayment of interstate charges or for any other reason.

#### **IV. Prohibiting Local Disconnection of Telephone Service for Failure to Pay Long Distance Charges Is Not in the Public Interest**

The Commission's suggested policy of prohibiting the disconnection of local telephone service for failure to pay long distance service is neither a narrowly-targeted nor a cost-effective solution for increasing subscribership. The Commission's proposal to mandate a national policy prohibiting local disconnection of telephone service for failure to pay long distance charges could impose significant costs on the entire telecommunications industry, slow the development of competition in all telecommunications markets, and possibly lead to increased rates charged to end users and access customers.

Parties arguing that the Commission should prohibit the disconnection of local service for failure to pay long distance charges appear to ignore that such policies have not proven to increase subscribership levels. No evidence has been presented on the record that demonstrates that subscribership has increased as a result of prohibiting a LEC from disconnecting local service for failure to pay long distance charges. Evidence has been presented, however, by IXCs and LECs, that demonstrates that such a prohibition contributes toward significant increases in carriers' uncollectibles.<sup>13</sup>

---

<sup>13</sup> For example, see Bell Atlantic Comments at 3, and MCI Comments at 15.

A few carriers, like TCG, argue that "unpaid long distance charges are an issue to be handled between long distance carriers and the subscriber."<sup>14</sup> They argue that "[a]s long as subscribers pay their local service charges, they should not lose their local exchange service."<sup>15</sup> Such positions are extremely narrow and short-sighted, and should be dismissed. Unpaid telephone services place upward pressure on the rates for all telecommunications services. It is not a matter that is limited solely "between long distance carriers and the subscriber."

Allowing subscribers to make unlimited telephone calls with the confidence that their local service will not be disconnected if they are unable to pay would misallocate resources, encourages wasteful use of telecommunications services, and shifts the burden and cost of managing telecommunication services from subscribers, who are best positioned to control use, to carriers.<sup>16</sup> It is one thing for the Commission to support a policy which discourages users from incurring costs that they cannot afford, and quite another thing for the Commission to mandate a policy that would provide an incentive for nonpayment of long distance bills.

Prohibiting the disconnection of local service to those customers who do not pay their long distance charges could cause paying customers to subsidize non-paying customers. Such a prohibition would benefit only non-paying

---

<sup>14</sup> TCG Comments at 5.

<sup>15</sup> Id.

<sup>16</sup> Telecommunications Resellers Association at 2.

customers and would raise uncollectible expenses that would have to be borne by the entire body of paying customers.

MCI advocates the use of pre-paid calling cards, or debit cards, for those end users that are concerned that they cannot control long distance usage. As Sprint, as well as many other carriers, argues, "prepaid calling cards enable customers to make long distance calls while controlling these expenditures."<sup>17</sup> Prepaid calling cards are also useful for highly mobile people, and are already developing without the need for Commission intervention.<sup>18</sup> Contrary to blocking or restricting long distance services, prepaid calling cards afford customers the ability to "pay as they go," and the luxury of increasing pre-set limits by adding to or purchasing additional cards.

MCI also advocates that the Commission encourage LECs to convey the definition of basic service to their customers in a clear and understandable fashion. Based on MCI's participation in the local telecommunications marketplace, MCI has discovered a significant level of confusion among telephone subscribers, of all income levels, as to what is included in basic service. Users, on and off the public switched network, have been so bombarded with advertisements and literature from the LECs that many consumers believe that expensive, discretionary services are a part of basic service. The Commission should encourage LECs to convey to all users and

---

<sup>17</sup> Sprint Comments at 14.

<sup>18</sup> TDS Telecommunications Comments at 8.

potential users of telecommunications services, that basic service consists of (1) residential access to the first point of switching; (2) touchtone (where available); (3) unlimited local usage or applicable limits; (4) access to operator services; (5) access to 911; and (6) access to directory assistance. Informing the public that basic telephone service does not have to include expensive discretionary services (like call waiting) could increase subscribership levels among low income households which currently do not subscribe to telephone service because they believe that expensive calling features are required.

**V. Southwestern Bell Telephone Company's Request for Additional Pricing Flexibility is Misplaced**

Southwestern Bell Telephone Company ("SWBT") argues in its Comments that market forces will ultimately ensure the most economically efficient prices and resource allocation for all services, including basic local, toll, and access services.<sup>19</sup> SWBT argues that "market forces are being stifled in that LECs are prohibited from pricing their services to the market," and that "unleashing market forces to shape the pricing of telecommunications services is the most economically efficient approach to benefit the greatest proportion of consumers."<sup>20</sup> SWBT urges the Commission, prior to adopting any of the

---

<sup>19</sup> Southwestern Bell Telephone Company Comments at 5.

<sup>20</sup> SWBT Comments at 5-6.

proposals being considered in the NPRM, to afford LECs complete pricing flexibility.<sup>21</sup>

MCI agrees that effective competition in all telecommunications markets will best serve end users. In addition to increasing the utility of telecommunications services, effective competition will result in lower rates for services which LECs have historically offered at excessive, monopoly levels. So that such competition can develop, MCI has continually urged the Commission to require monopoly LECs to provide unbundled, essential local bottleneck facilities at cost-based rates.

SWBT's request for immediate pricing flexibility is misplaced. The issue of how much pricing and regulatory flexibility should be afforded the LECs has already been initiated in the Commission's Further Notice of Proposed Rulemaking.<sup>22</sup> However, even in that docket, the Commission has not suggested offering SWBT, or any other LEC, the complete and immediate pricing flexibility that SWBT seeks. LECs have failed to demonstrate that their services face actual, effective competition. Until the Commission finds that such competition exists, the LECs should not be afforded increased pricing or regulatory flexibility.

---

<sup>21</sup> Id.

<sup>22</sup> In the Matter of Price Cap Performance Review for Local Exchange Carriers, Second Further Notice of Proposed Rulemaking, ("Further Notice of Proposed Rulemaking") CC Docket No. 94-1, FCC 95-393, released September 20, 1995.



## **VI. NYNEX's Proposed Fund Should Not Be Financed Primarily By Interexchange Carriers**

In its comments, NYNEX suggests that the Commission may wish to consider establishing an explicit, discrete fund for the purpose of extending the information highway to schools, libraries and similar institutions.<sup>23</sup> NYNEX suggests that such a fund should be financed from all telecommunications service providers based on their share of total interstate retail revenues.<sup>24</sup> While MCI believes that it is absolutely critical to deliver advanced information services to the classroom, it is premature for the Commission to consider establishing a discrete fund that may or may not be consistent with language pending before the Congress, and which would disproportionately tax interexchange carriers.

MCI, like many other carriers, has publicly supported the Commission's goal to wire schools and libraries for advanced telecommunications services. For example, in just the last one and one-half years MCI has contributed more than \$2.3 million through the MCI Foundation in order to promote this goal (see attached). Additionally, as recently as September 21, 1995, MCI CEO Bert Roberts joined President Clinton in announcing a major corporate initiative to launch California schools into the information age (see attached). At that time, MCI announced that it would contribute computer software that will enable thousands of California students to connect to the Internet, the vast electronic

---

<sup>23</sup> NYNEX Comments at 2.

<sup>24</sup> Id.

network that links research, academic and commercial computers around the world.

The LECs have continually advanced the notion that regulators should allow them to “gold plate” their networks, in essence, to rewire America, as a prerequisite to bringing advanced telecommunications services to our nation’s schools and libraries. This myth was exposed by Vinton Cerf, one of the architects of the Internet, in a letter to Chairman Hundt, sent December 5, 1994. In this letter, it was explained that:

Many of the applications of interest to schools can be provided today, or in the relatively near future, through existing networks and technologies, and don’t require rewiring the entire nation with fiber.<sup>25</sup>

In addition, the letter pointed out that the most economically efficient way to ensure that America’s students have access to advanced telecommunications services, at the lowest possible prices, is not by establishing additional funds, but by opening markets that are now closed to competition.

The Commission should ensure that effective competition develops in all telecommunications markets. It should refrain from imposing additional costs on carriers that could act as significant barriers to entry.

---

<sup>25</sup> See Attached Letter from Vinton Cerf, Sr. Vice President, Data Services Architecture, MCI Telecommunications Corporation to Chairman Hundt, Federal Communications Commission, December 5, 1994.

## **VII. Conclusion**

MCI reiterates its position that before the Commission takes steps that would interfere in the marketplace (i.e., prohibiting local exchange carriers from disconnecting local services to customers who fail to pay long distance charges), the Commission must have evidence that clearly demonstrates why people select not to subscribe to telephone service. Presently, only speculations have been made. In the meantime, the Commission should take action to ensure that existing federal policies (e.g. Lifeline and Link-Up) are reaching the targeted population, utilize its forum as a “bully-pulpit” to make sure that all people fully understand the benefits and utility of existing telecommunications services, and promote policies that lead to the emergence of effective competition in all

telecommunications markets. By so doing, the Commission could increase subscribership to targeted audiences, without increasing the cost of providing telecommunications services.

Respectfully submitted,  
MCI TELECOMMUNICATIONS CORPORATION

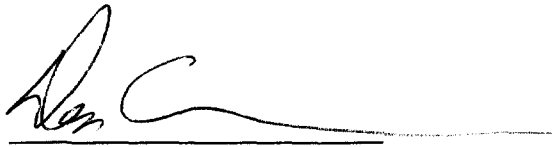
A handwritten signature in black ink, appearing to read 'Don Sussman', followed by a long horizontal line extending to the right.

Don Sussman  
Regulatory Analyst  
1801 Pennsylvania Ave., NW  
Washington, D.C. 20006  
(202) 887-2779

November 20, 1995

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on November 20, 1995.

A handwritten signature in black ink, appearing to read 'Don Sussman', followed by a horizontal line.

Don Sussman  
1801 Pennsylvania Avenue, NW  
Washington, D.C. 20006  
(202) 887-2779

## **MCI FOUNDATION GRANTS - 1995**

### **General Education:**

o Brooking Institute	\$ 10,000
o Community of Hope	\$ 10,000
o Computer Ethics Institute	\$ 2,500
o Consumer Federation of America	\$ 2,000
o DeLaSalle Education Center	\$ 10,000
o Jr. Achievement of Chicago	\$ 1,000
o Jr. Achievement of Wisconsin	\$ 2,500
o Minnesota Higher Education	\$ 27,000
o Monterey Jazz Festival	\$ 30,000
o National Alliance of Business	\$ 40,000
o National Council on Economic Education	\$ 1,000
o Institute for Public Relations Research and Education	\$ 6,000
o Knowledge Network for all Americans	\$ 10,000
o National Coalition of Consumer Education	\$150,000
o St. Louis Art Museum	\$ 10,000
o University of Colorado	\$ 10,000
o Young Adult Institute	\$ 10,000

---

<b>Total 1995 General Education</b>	<b>\$332,000</b>
-------------------------------------	------------------

**Education/Technology:**

o Albuquerque/Bernalillo County Public Library	\$ 20,000
o Arizona State University	\$ 42,000
o Arlington County Public Library	\$ 20,000
o Buffalo Free-Net	\$ 10,000
o College of Willima and Mary	\$ 35,000
o Connecticut Association for Children w/Learning Disabilities	\$ 4,500
o Dallas Academy	\$ 9,000
o Davis County School District	\$ 10,000
o Denver Public Library	\$ 20,000
o Electronic Frontier Foundation	\$ 25,000
o Global Schoolnet Foundation	\$ 35,000
o Greenville County Library	\$ 20,000
o Las Virgenes Unified School District	\$ 10,000
o Marist College	\$ 10,000
o Memphis/Shelby County Public Library	\$ 20,000
o Michiana Free-Net Society	\$ 52,895
o Michigan Economics Education Council	\$ 30,000
o National Consumer League	\$ 7,500
o National Museum of American Art	\$ 50,250
o Phoenix Public Library	\$ 30,000
o Sacramento Public Library	\$ 20,000
o Scitrek	\$ 2,500
o Stratham Memorial School	\$ 10,000
o United Negro College Fund - Howard University	\$ 20,000
o University of Northern Iowa	\$ 25,000
o WETA Public Television and Radio	\$ 16,500

---

<b>Total 1995 Education/Technology</b>	<b>\$555,145</b>
--	------------------

## **MCI FOUNDATION GRANTS - 1994**

### **General Education:**

o AFCEA Educational Fund	\$ 15,000
o California Academy of Math/Science	\$ 10,000
o Capitol College	\$ 20,000
o Chicago Youth Symphony	\$ 2,500
o Cities in Schools	\$ 25,000
o Dallas Can! Academy	\$ 25,000
o DeLaSalle Education Center	\$ 10,000
o Duke Ellington School of Arts	\$ 10,000
o Ford's Theatre	\$ 10,000
o Fordham University School of Law	\$ 5,000
o Foreign Press Foundation	\$ 2,000
o GW School of Business/Public Management	\$ 20,000
o Heritage Classic Foundation	\$ 25,000
o Hispanic Business Scholarships	\$ 10,000
o International Scholar Award Program	\$102,500
o Jr. Achievement - Rocky Mountain	\$ 2,500
o Lead Program in Business	\$ 35,000
o MacKintosh Academy of Colorado Springs	\$ 1,000
o Mercer University	\$ 10,000
o Minnesota Higher Education	\$ 15,000
o Monterey Jazz Educational Fund	\$ 30,000
o National Alliance of Business	\$ 50,000
o National Alliance of Business	\$ 30,000
o National Coalition for Consumer Education	\$100,000
o National Press Foundation	\$ 5,000
o Northwestern University (HANDS Program)	\$ 3,000
o Pinellas County Education Fund	\$ 5,000
o Regis University	\$ 2,500
o Society of Hispanic Professional Engineers	\$ 5,000
o Stars in the Schools	\$ 1,000
o The National Conference	\$ 5,000



o United Negro College Fund	\$ 15,000
o University of Chicago	\$ 10,000
o University of Colorado - Boulder	\$ 10,000
o University of Colorado - Denver	\$ 10,000
o University of Illinois - Champaign	\$ 15,000
o University of Iowa	\$ 10,000
o University of South Florida	\$ 10,000
o University of Texas - Dallas	\$ 1,000
o Urban League of Greater Richmond	\$ 5,000

---

<b>Total 1994 General Education</b>	<b>\$678,000</b>
-------------------------------------	------------------